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Attorneys for Plaintiff
PLEXXIKON INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PLEXXIKON INC.,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

Case No. 4:17-cv-04405-HSG

**PLAINTIFF PLEXXIKON INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL L.R. 7-
11 AND 79-5**

Ctrm: E – 15th Floor
Mag. Judge: Honorable Elizabeth D. Laporte

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Plexxikon Inc. (“Plexxikon”) respectfully submits this Administrative Motion to File under Seal. The following documents contain information designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” by Defendant Novartis Pharmaceuticals Corporation (“NPC”) and/or third-party GlaxoSmithKline (“GSK”) pursuant to the Protective Order entered in this matter. Plexxikon takes no position as to the confidentiality of these documents and seeks sealing solely to remain in compliance with the Protective Order. To that end, if this material is subject to protection, Plexxikon expects that, within four days of the service and filing of this motion, NPC and/or GSK will file declarations supporting this motion as required by Civil Local Rule 79-5. Pursuant to Local Rule 79, NPC and/or GSK bear the burden of submitting declarations, based on personal knowledge, demonstrating good cause for why these materials should remain sealed. *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006).

Document	Portions to be Sealed	Reasons for Sealing
Exhibit B to the February 13, 2019 Joint Letter	To be sealed in its entirety	Designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by Novartis and/or GSK
Exhibit C to the February 13, 2019 Joint Letter	To be sealed in its entirety	Designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by Novartis and/or GSK

Although the Plexxikon does not take a position on whether it is critical to seal the designated documents and information from the public record, Plexxikon has filed the instant motion so as to comply with the Protective Order.

Dated: February 13, 2019

DURIE TANGRI LLP

By: /s/ Daralyn J. Durie
DARALYN J. DURIE

Attorneys for Plaintiff
PLEXXIKON INC.

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I hereby certify that on February 13, 2019 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ *Daralyn J. Durie*
DARALYN J. DURIE